

EVALUATION – VIOLATION – ENFORCEMENT FORM

12/2000 VERSION

Handler ID Number WV4151909112		Contact Name DAVE ANDERSON OR SAM ADAMS	RESERVED FOR EPA USE
Handler Name ALDERSON FEDERAL CORRECTIONAL INSTITUTION			
Street GLEN RAY ROAD	City ALDERSON		

UNIVERSE CHANGE REQUIRED

YES ☒ NO ☐

I. Indicate the facility's current universe(s):

SQG

II. Indicate the new RCRIS Generator Universe:

(mark only one)

LQG ☐ CEG ☐ NON-HANDLER ☒
SQG ☐ CLOSED ☐

III. Indicate the new transporter status (Mark here only if the Facility requires a transporter status change):

Transporter If the transporter box is checked, you must check at least one of the boxes below: Mark Mode of Transportation <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway	Non-Transporter Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.
--	--

EVALUATION Add ☒ Change ☐ Delete ☐

Date	Number	Agency	Type	Reason	Branch	Person
07 24 2002		S	CEI		CAER	WVPLH

AREAS OF EVALUATION (E – Evaluated NE – Not Evaluated NA – Not Applicable)

GGR <input checked="" type="checkbox"/>	GSC <input type="checkbox"/>	TWD <input type="checkbox"/>	DGW <input type="checkbox"/>	DOR <input type="checkbox"/>	DWP <input type="checkbox"/>	BRR <input type="checkbox"/>	FEA <input type="checkbox"/>
GLB <input type="checkbox"/>	GSQ <input checked="" type="checkbox"/>	DCH <input type="checkbox"/>	DLB <input type="checkbox"/>	DPB <input type="checkbox"/>	DIN <input type="checkbox"/>	BPS <input type="checkbox"/>	CSS <input type="checkbox"/>
GMR <input type="checkbox"/>	GEX <input type="checkbox"/>	DCL <input type="checkbox"/>	DLF <input type="checkbox"/>	DPP <input type="checkbox"/>	DIA <input type="checkbox"/>	BIS <input type="checkbox"/>	UOR <input checked="" type="checkbox"/>
GOR <input type="checkbox"/>	TGR <input type="checkbox"/>	DCP <input type="checkbox"/>	DLT <input type="checkbox"/>	DSI <input type="checkbox"/>	DPS <input type="checkbox"/>	BCE <input type="checkbox"/>	UWR <input type="checkbox"/>
GPT <input type="checkbox"/>	TMR <input type="checkbox"/>	DFR <input type="checkbox"/>	DMS <input type="checkbox"/>	DTR <input type="checkbox"/>	DOP <input type="checkbox"/>	BDT <input type="checkbox"/>	
GRR <input type="checkbox"/>	TOR <input type="checkbox"/>	DGS <input type="checkbox"/>	DMR <input type="checkbox"/>	DTT <input type="checkbox"/>	DMI <input type="checkbox"/>	CAS <input type="checkbox"/>	

Comments Non-Handler with Used Oil and UW Fluorescent bulbs only – no violations noted.

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION Add ☐ Change ☐ Delete ☐ Link to Above Evaluation? (Y/N) ☐

Agency	Number	Area	Class	Reg Type	Regulation Citation
Date Determined	Branch	Person	RTC Qualifier	Returned to Compliance Scheduled Actual	

Comments:

VIOLATION Add ☐ Change ☐ Delete ☐ Link to Above Evaluation? (Y/N) ☐

Agency	Number	Area	Class	Reg Type	Regulation Citation
Date Determined	Branch	Person	RTC Qualifier	Returned to Compliance Scheduled Actual	

Comments:

FILE COPY

change type

TSD → SQU

~~X~~

RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM
MAINTENANCE FORM FOR EPA NOTIFICATION

EPA-ID# 1W1V14111511191019111121 Date: 10-19-94

FACILITY NAME Federal Correctional Inst - Alderson

New Facility Name

Name Change _____

Location of Installation

Street _____

City/Town _____ State _____ Zip _____

County Code _____ County Name _____

Installation Mailing Address

Street _____

City/Town _____ State _____ Zip _____

Installation Contact

Last Name _____ First _____

Job Title _____ Phone # _____

Street _____

City/Town _____ State _____ Zip _____

Ownership

Name of Legal Owner _____

Street _____

City/Town _____ State _____ Zip _____

Phone # (____) _____ Land Type _____ Owner Type _____

Waste Codes

Delete Old Waste Codes

Add New Waste Codes

Updated in RCRIS by _____ HST. Date 10-20-94

RR

10/24/94

Waste Activity	Type	RCRA Reg. Status	RCRA Reg. Desc.
Generator	<u>2</u>	_____	_____
TSD	_____	_____	_____
Transporter	_____	_____	_____
Mode of Transportation:			
Air	Rail	Highway	Water
_____	_____	_____	_____
Other	_____		
Burner/Blender	B Boiler and/or Industrial Furnace (BIF) only. D BIF only; Smelter Deferral. E BIF only; Small Quantity Exemption claimed. N Not a Burner/Blender, Verified. X Other Burner/Blender Activity. Blank Unverified.		
HWF Market to Burner	X Code indicates that the handler is a generator engaged in marketing to burners of hazardous waste fuel activities. Blank No activity.		
HWF Other Market	X Code indicates that the Handler is engaged in hazardous waste fuel marketing activities other than generator marketing to burner.		
HWF Burner	B Boiler and/or Industrial Furnace. X Indication of activity.		
OSO Market to Burner	X Code indicates that the handler is a generator engaged in marketing to burners of off-spec. used oil fuel.		
OSO Other Market	X Code indicates that the Handler is engaged in marketing of off-spec. used oil fuel other than generator marketing to burner (e.g., marketing to used oil refinery).		
OSO Burner	B Boiler and/or Industrial Furnace. X Indication of Activity.		
SO ACT:	Code indicating that the handler is engaged in marketing of specification fuel oil activities. B Boiler and/or Industrial Furnace. X Indication of Activity.		
Burner Types	Utility Boiler _____ Industrial Boiler _____ Ind. Furnace _____		
Underground Injection Control	X Code indicates that the Handler generates and/or treats, stores, or disposes of hazardous waste and has an injection well located at the installation.		
Recycler:	C Commercial R Non-Commercial Recycler N Not a Recycler, Verified Blank Not a recycler, unverified.		

EVALUATION-VIOLATION-ENFORCEMENT FORM

WV4151909112

LDF[] TSF[] INC[] LOG[] SOG[X] CEG[] TRA[]

ALDERSON

FEDERAL CORRECTIONAL INSTITUTION

PAUL BRUNTY

09 13 94

COUNTY 3/22

ALDERSON, WV

66 9/19/94

X

Date			Number		Agency	Type	Reason	Branch	Person
09	13	94			S	CEI		CM	JRF

Areas of Evaluation (EV-Evaluated, NE-Not Evaluated, NA-Not Applicable)

GER		GPT		GBF		TWD		DGS		DLT		DPB		DWP	
GGR		GRR		TGR		DCH		DGW		DMC		DPP		DBF	
GLB	EV	QSC		TMR		DCL		DIN		DMR		DSI		CAS	
GMR		GSQ	EV	TOR		DCP		DLB		DOR		DTR		FEA	
GOR		GEX		TRR		DFR		DLF		DOT		DTT		CSS	

Comments: FACILITY IS A S.O.G.. NO RCRA VIOLATIONS OBSERVED.

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)												
<table style="width: 100%;"> <tr> <th>Agency</th> <th>Number</th> <th>Area</th> <th>Class</th> <th>Regulation Type</th> <th>Regulation Citation</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Agency	Number	Area	Class	Regulation Type	Regulation Citation										
Agency	Number	Area	Class	Regulation Type	Regulation Citation											
Returned to Compliance																
<table style="width: 100%;"> <tr> <th>Date Determined</th> <th>Priority</th> <th>Branch</th> <th>Person</th> <th>Scheduled</th> <th>Actual</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Date Determined	Priority	Branch	Person	Scheduled	Actual										
Date Determined	Priority	Branch	Person	Scheduled	Actual											

Comments:

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)												
<table style="width: 100%;"> <tr> <th>Agency</th> <th>Number</th> <th>Area</th> <th>Class</th> <th>Regulation Type</th> <th>Regulation Citation</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Agency	Number	Area	Class	Regulation Type	Regulation Citation										
Agency	Number	Area	Class	Regulation Type	Regulation Citation											
Returned to Compliance																
<table style="width: 100%;"> <tr> <th>Date Determined</th> <th>Priority</th> <th>Branch</th> <th>Person</th> <th>Scheduled</th> <th>Actual</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Date Determined	Priority	Branch	Person	Scheduled	Actual										
Date Determined	Priority	Branch	Person	Scheduled	Actual											

Comments:

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)												
<table style="width: 100%;"> <tr> <th>Agency</th> <th>Number</th> <th>Area</th> <th>Class</th> <th>Regulation Type</th> <th>Regulation Citation</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Agency	Number	Area	Class	Regulation Type	Regulation Citation										
Agency	Number	Area	Class	Regulation Type	Regulation Citation											
Returned to Compliance																
<table style="width: 100%;"> <tr> <th>Date Determined</th> <th>Priority</th> <th>Branch</th> <th>Person</th> <th>Scheduled</th> <th>Actual</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Date Determined	Priority	Branch	Person	Scheduled	Actual										
Date Determined	Priority	Branch	Person	Scheduled	Actual											

Comments:

☐ =Required
 ☐ =Required if pert.
 ☐ =Req. for prev. reported data
 ☐ =Not required by EPA



5
COPY

DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

1356 Hansford Street
Charleston, WV 25301-1401

Gaston Caperton
Governor

John M. Ranson
Cabinet Secretary

September 15, 1994

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

Paul Brunty, Safety Manager
Federal Correctional Institution
Post Office Box B
Alderson, West Virginia 24910

Dear Mr. Brunty:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by a representative of the Chief from the Office of Waste Management. This report is based on the inspection conducted on September 13, 1994.

There were no areas of non-compliance with the appropriate Hazardous Waste Management Regulations documented during the inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact Inspector J. R. Fredericks at **256-6850**.

Sincerely,

Thomas A. Fisher
Inspector Supervisor - Southern Unit
Compliance Monitoring/Enforcement
Office of Waste Management

kw

Enclosure

cc: Jeanne Sofield, U.S. EPA, Region III
J. R. Fredericks, Inspector
File



**BUREAU OF ENVIRONMENT
DIVISION OF ENVIRONMENTAL PROTECTION
Office of Waste Management**

Gaston Caperton
Governor

David C. Callaghan
Director

David C. Callaghan
Commissioner

SMALL QUANTITY GENERATOR--COMPLIANCE EVALUATION INSPECTION

L. Eli McCoy
Deputy Director

The regulations for this inspection are the WV Hazardous Waste Management Act (Chapter 22-18), 47CSR35
Section 3.2.1.a. & 40CFR 260-265, which apply to facilities generating >100kg/month but <1000kg/month of Hazardous Waste (HW).

COMPANY NAME: ALDERSON FEDERAL CORRECTIONAL INSTITUTE EPA ID#: WV4151909112

MAILING ADDRESS: FCI LOCATION: SAME

ALDERSON, WV 24910 COUNTY: MONROE PHONE: (304)445-2901

COMPANY CONTACT: PAUL BRUNTY TITLE: SAFETY MANAGER ADV. OF AUTHORITY: (Y/N) Y

DATE INSPECTED: September 13, 1994 INSPECTORS: (1) J.R. FREDERICKS DATE PREPARED: 09/13/94

TIME OF INSPECTION: 10:30AM (2) _____ PREPARED BY: JRF

VIOLATIONS: (Y/N) _____ ACTION TAKEN: _____ FACILITY DESCRIPTION: CORRECTIONAL INSTITUTION
(NOV/CAP/Enf Ref/Other)

Hazardous Wastes (as Notified or updated) Qty/Mo. Disposal Co./Method
D001 - WASTE PAINT RELATED MATERIALS -LESS THAN 5 GALLONS PER MONTH - SAFETY-
KLEEN

D001/D002 MISCELLANEOUS IGNITABLE OR CORROSIVE MATERIALS HAVE BEEN DISPOSED OF IN THE LAST
TWO YEARS - UP TO 3850 LBS IN ONE SHIPMENT - BIOENVIRONMENTAL SERVICES, CHEMICAL CONSERVATION
GEORGIA.

47CSR35 Section

YES NO N/A

3.2.1.a.B	Has facility made HW Determination for all waste?	✓		
3.2.1.a.C	Has facility notified for all HW streams?	✓		
3.2.1.a.D	All HW on-site <180 days (<270 days if TSDF >200miles & <6000kg HW on-site)?	✓		
3.2.1.a.E (a)	All containers of HW in good condition?	✓		
(b)	All containers of HW closed except when adding / removing waste?	✓		
(c)	All containers of HW handled such that they will not rupture / leak?	✓		
(d)	Are HW container storage areas inspected weekly and leaks/deterioration remediated upon detection?	✓		
(e)	Incompatible wastes placed in separate containers?			✓
(f)	Containers for incompatible HW separated by dike, wall, berm, etc.?			✓
3.2.1.a.F	If facility accumulates HW in tanks, is facility complying with 40CFR §265.201?			✓
3.2.1.a.G	If facility permanently closed a container/tank storage area, did facility comply with 40CFR §265.114?			✓
3.2.1.a.H (a)	All containers of HW clearly and visibly marked with accumulation start date?			✓
(b)	All containers / tanks of HW clearly labeled or marked "Hazardous Waste"?			✓
3.2.1.a.I (a)	Is waste reclaimed under contract specifying waste type and shipment frequency?	✓		
(b)	Is transport vehicle owned and operated by the reclaimer?	✓		
(c)	Copy of reclamation agreement kept on site for at least 3 years?	✓		
3.2.1.a.J (a)	Copy of each properly completed manifest kept on site for at least 3 years if no reclamation agreement?	✓		
(b)	Copies of any test results, waste analyses, etc. kept on site for at least 3 years?	✓		
(d)	Copy sent to notify Chief if signed manifest not returned from TSDF in 60 days?	✓		
3.2.1.a.K	Does operating manner minimize risk of fire / explosion / unplanned release?	✓		
3.2.1.a.K (a)	Adequate alarm system, fire protection equipment & spill control equipment?	✓		
(b)	Are the above tested and maintained to assure proper operation in emergency?	✓		
(c)	When handling HW do all persons involved have immediate access to the above?	✓		
(d)	Adequate aisle space for movement of personnel & emergency equipment?	✓		
(e)	Arrangements with all appropriate local & state emergency response agencies?	✓		
(f)	Documentation in operating record for any agency declining such arrangement?	✓		
(g)	At least one designated emergency coordinator on site or on call at all times?	✓		
(h)	All required emergency information posted next to a telephone?	✓		
(i)	Do all employees know proper waste handling procedures & emergency procedures?	✓		
(j)	Does emergency coordinator know proper responses which are his duty to initiate in an emergency?	✓		
(k)	For release of HW affecting outside area, did facility properly report to National Response Center?	✓		

COMMENTS: FACILITY IS A SMALL QUANTITY GENERATOR. OCCASIONALLY HAZARDOUS WASTES ARE

GENERATED IN QUANTITIES GREATER THAN CONDITIONALLY EXEMPT AMOUNTS. EXCEPTIONS FOR HAZARDOUS WASTES IN QUANTITIES GREATER THAN 1000KG IN ONE MONTH SHOULD BE REPORTED IN WRITING TO THE CHIEF OF WASTE MANAGEMENT, AND BE NOTED ON BIENNIAL REPORTS.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection *Federal Corrections Institution
Alderson WV
WV 4 15 190 9112*

DATE: *6/25/07*

FROM: *DD* Douglas A. Donor, Environmental Scientist
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: John A. Armstead, Chief *gms*
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

*SQG Federal Facility
Needs Copies of Waste Analyser, access to storage of waste*



STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

June 15, 1987

JUN 22 1987
RCRA COMPLIANCE SECTION
RECEIVED

Ms. Colleen Clohessy
F. C. I. - Alderson
F. C. I. Alderson
Alderson, West Virginia 24910

Dear Ms. Clohessy:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on May 21, 1987.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Division with an additional copy transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz
Compliance Monitoring and
Enforcement Section Leader

ACZ/pd
Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
Penny Brown, Inspector

INSPECTION FACT SHEET

Company Name: F.C.I. - Alderson

I.D. #: WV4151909112

Mailing Address: F.C.I. Alderson
Alderson, WV 24910

Type Operation: S.Q.G.

Location: same

Company Contact: Colleen Clohessy

Title: Factory Manager

Phone: (304) 445-2901 ext. 368

Purpose of Inspection: Compliance Evaluation Inspection (C.E.I.)

Applicable Regulations: West Virginia Hazardous Waste Management Act,
Chapter 20, 5E and 40 CFR, Part 260-265

List of Hazardous Wastes: D001, D000, F003, F005
(D001/D000) as

Date Inspected: May 21, 1987

Inspector(s): P. L. Brown

Date Prepared: May 26, 1987

Prepared By: P. L. Brown

TABLE OF CONTENTS

Location Map

Inspection Report

Compliance Evaluation

Attachments

"A" Site Map

"B" Facility Entry Form

"C" Small Quantity Generator Checklist

ALDERSON, W. VA.

NW/4 ALDERSON 15' QUADRANGLE

N3737.5—W8037.5/7.5

1971

PHOTOREVISED 1976

MS 4859 II NW—SERIES V854

529

40'

530

2 100 000 FEET 531

532

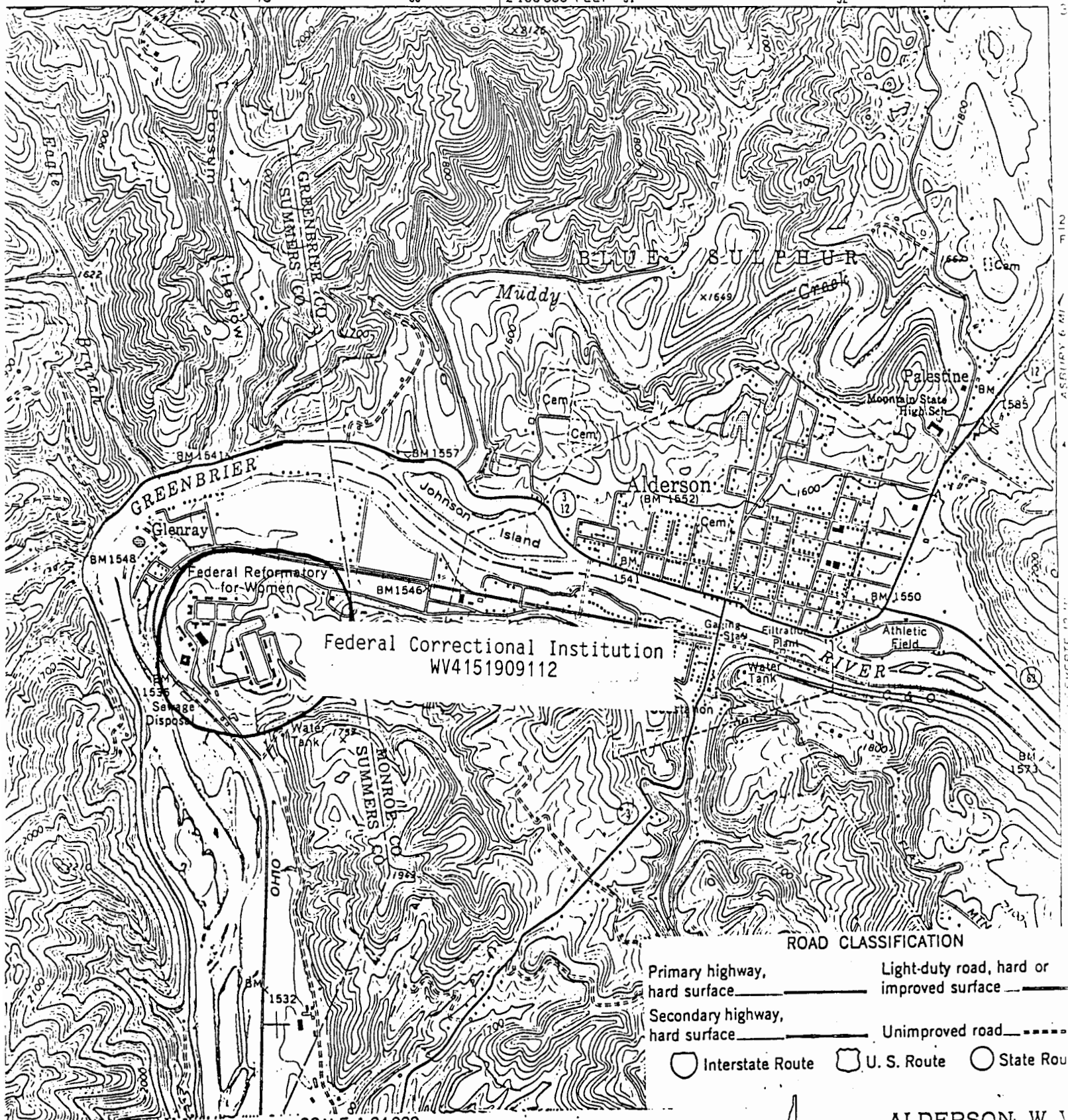
80° 37' 3

ALDERSON QUADRANGLE

WEST VIRGINIA

7.5 MINUTE SERIES (TOPOGRAPHIC)

NW/4 ALDERSON 15' QUADRANGLE



Federal Correctional Institution
WV4151909112

ROAD CLASSIFICATION

- Primary highway, hard surface _____ Light-duty road, hard or improved surface _____
Secondary highway, hard surface _____ Unimproved road _____
○ Interstate Route ○ U. S. Route ○ State Route

SCALE 1:24 000

1 MILE



ALDERSON, W. VA.
NW/4 ALDERSON 15' QUADRA
N3737.5—W8037.5/7

1971

PHOTOREVISED 197

INSPECTION REPORT

On May 21, 1987, this inspector accompanied by Riley Sain and Eddie Riffle of WVDNR Waste Management Division, conducted a Compliance Evaluation Inspection of F.C.I. - Alderson. Upon our arrival at 1330 we were met by Coleen Clohessy, factory manager, and Wally Howard, safety manager, who had been previously advised via a phone conversation of my intentions to inspect the facility.

Upon presentation of appropriate credentials, I advised the officials of my authority as representative of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged my authority. The facility representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

DESCRIPTION OF FACILITY OPERATIONS:

The decal factory of the Federal Correctional Institution at Alderson is a small quantity generator whose hazardous waste consists primarily of waste paint-thinner-soaked rags containing toluene (F005) and ignitable paints (D001). While wastes containing cyclohexanone (F003), and chromium and lead (D007/D008) are generated, these amounts are small by comparison. For the past year the facility has been generating approximately three 55-gallon drums of

waste-saturated rags per month. All hazardous waste is transported to Environmental Enterprises in Cincinnati, Ohio via Belpar Chemical Services in Charleston, West Virginia. The representatives are considering applying for a Part B to incinerate the rags, but for the time being have decided to try washing down the screens using the thinner and a brush-type parts cleaner instead of the rags. This method, if satisfactory, should eliminate the waste rags. It will also condense the numerous wash stations in the factory to just one area in a separate room. Mr. Howard said this may also be preferable to the present method because of the reduction of fire hazards (the wash solution is highly ignitable).

DESCRIPTION OF VIOLATION CONDITIONS:

One area of concern was noted in the drum storage area. The number of drums of hazardous waste could not be counted exactly due to crowding in the building which also houses unused product.

The facility did not have the location of fire extinguishers and spill control material posted next to a phone in the factory (non-compliance item 1).

OFFICE - Description of paperwork violation conditions:

Ms. Clohessy informed us that Belpar Chemical Service had performed a waste analysis last year, however a copy of this was not on file (non-compliance item 2).

Manifests are kept on file for each shipment.

Material Safety Data Sheets are on file for all inks and thinners used.

I concluded the inspection, thanked the facility representatives for their cooperation and assistance, then departed the facility.

COMPLIANCE EVALUATION

Non-compliances:

The following violations of the WV Hazardous Waste Administrative Regulations (hereinafter the Regulations) were noted during this inspection:

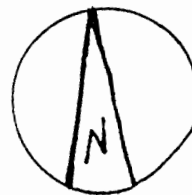
- (1) The location of fire extinguishers and spill control material were not posted by a phone at the factory. This is in violation of 40CFR Part 262, however applicable State Regulations were not in effect at the time of this inspection.
- (2) The facility does not have on file a copy of any test results or waste analyses made in accordance with Section 6.1.1 of the Regulations (Hazardous Waste Determination).

Concerns:

The following area of concern was noted during this inspection:

- (1) The drum storage area was crowded with empty drums, drums of unused material and hazardous waste to the point that it was difficult to see labels or count drums.

Federal Correctional Institution - Alderson, WV
WV4151909112

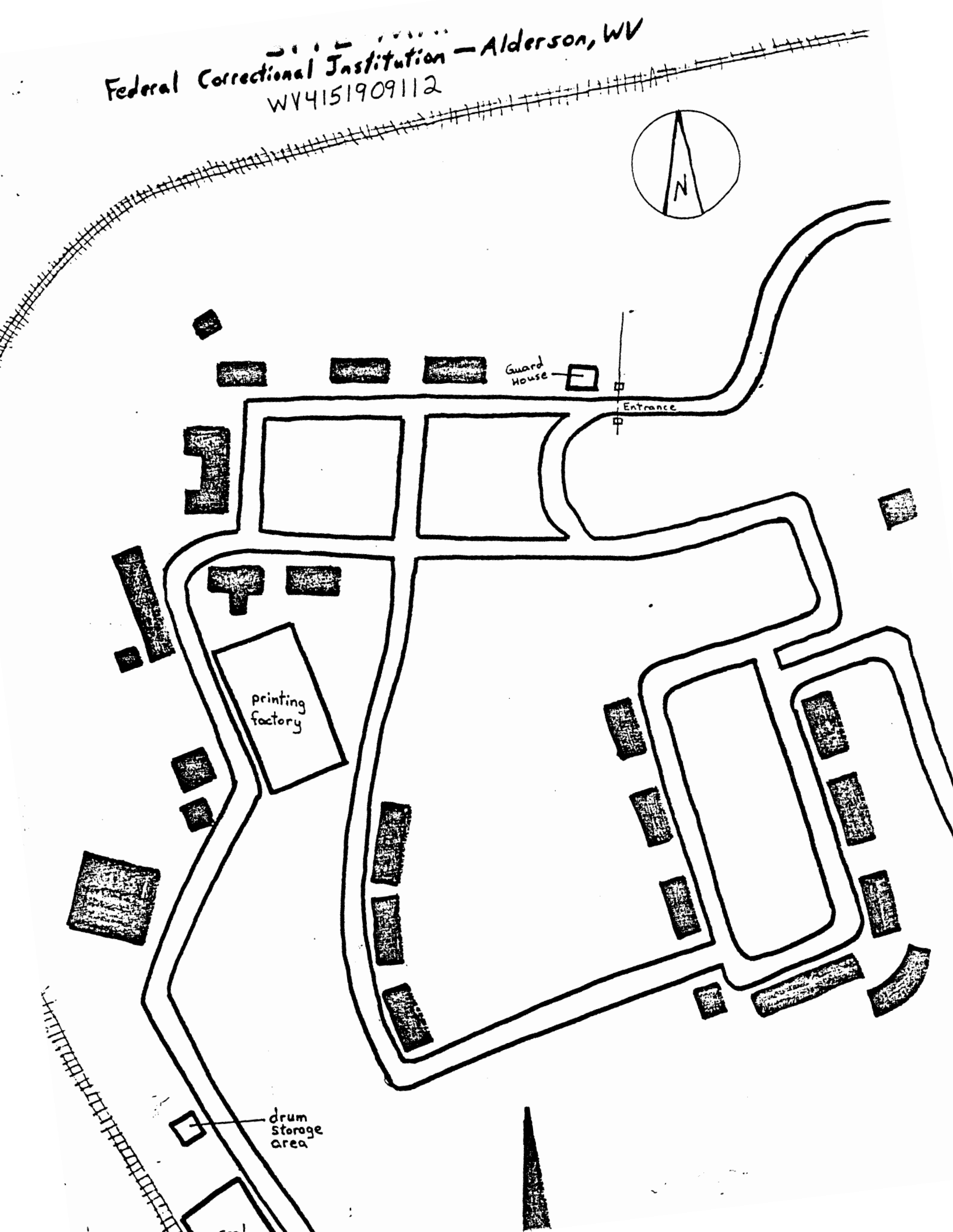


Guard House

Entrance

printing
factory

drum
storage
area



FACILITY ENTRY FORM

On May 21, 1987 at 1330 this inspector
Date Time

presented his/her Identification Card and explained Inspection

Authorities to Colleen Clohesy, factory mgr., of
Facility Representative

Federal Correction Institution - Alderson Print Shop
Facility

P. L. Brown

Inspector's Signature

Authority for this inspection appears in Chapter 20, Article 5E, Section 12 of the Code of West Virginia; in the West Virginia Administrative Regulations for Chapter 20, Article 5 of the Code of West Virginia, and the Resource Conservation and Recovery Act (RCRA), Section 3007(a).

The inspector is a duly authorized representative of the Chief of the Division of Waste Management, West Virginia Department of Natural Resources and as such has the powers provided by Articles 5E, and 5F of Chapter 20 of the West Virginia Code.

I consent to this inspection at 1330, on May 21, 1987
Time Date

Colleen Clohesy

Representative's Signature

SMALL QUANTITY GENERATOR INSPECTION SHEET

I. General Facility Information.

Facility Name: FCI Alderson

Facility Location: Alderson, WV

WV

Facility Contact: Colleen Clehessy, Factory Mgr.

Epa ID Number: WV4151909112

Comments: _____

Wastes (as Notified or updated)	Qty/Mo.	Disposal Company
D001	} paint & thinner waste 3 drums/month	Environmental Enterprises Cinti, OH
F003		
F005		
D000		

II. Checklist for Conditionally Exempt Small Quantity Generators.

A. Are less than 1,000 kg of hazardous waste stored onsite?
 (Y or N) 10.2.6

B. If the facility is a manufacturing facility, does the CESQG keep on-site a written record specifying the quantity and types of hazardous waste disposed of, the dates the wastes were transported off-site, and the final disposition of these wastes? (Y or N) 10.2.7.c

C. Does the CESQG send his waste to a federally or state permitted disposal facility, a state authorized facility, or a facility which beneficially reuses the waste? (Y or N) 10.2.7.d

D. Comments: NOT EXEMPT

III. Checklist for 100 to 1,000 kg per month SQG's.

A. Storage requirements:

1. Requirements for wastes stored in containers.

- 10.1.3 a. Is storage less than 180 days ☒ (Y) or N) or, if the generator must ship his waste more than 200 miles to a TSD, is storage less than 270 days? ☒ (Y) or N)
- 10.1.3.a b. Is storage less than 6,000 kg on-site? ☒ (Y) or N)
- 10.1.3.c c. Are containers labeled "HAZARDOUS WASTE," with the date marked when collection began? ☒ (Y) or N)
- 10.1.3.b d. Are containers in good condition? ☒ (Y) or N)
- 10.1.3.b e. Are containers kept closed? ☒ (Y) or N)
- 10.1.3.b f. Are containers inspected weekly? (no log required) ☒ (Y) or N)
- 10.1.3.b g. Are reactive and ignitable wastes stored in a "buffer zone"? (Does not have to be 50 feet from property line) ☒ (Y) or N)
- 10.1.3.b h. Are incompatible wastes stored separately? ~~Y or N~~ ^{N/A}

2. Requirements for wastes stored in tanks: ~~NOT TANKS~~

- 10.1.3.b a. Are tanks covered (Y or N) or, if open, do they have at least two feet of freeboard? (Y or N)
- 10.1.3.b b. On continuous-feed tanks, is there a shutoff or bypass valve? (Y or N)
- 10.1.3.b c. Are monitoring and gauging systems checked daily? (Y or N)
- 10.1.3.b d. Are tanks checked weekly for corrosion and leaks? (Y or N)
- 10.1.3.b e. Are NFPA buffer zone requirements for ignitable and reactive wastes being met? (Y or N)
- 10.1.3.a f. Is storage less than 6,000 kg on-site? (Y or N)
- 10.1.3 (10.1.4) g. Is storage less than 180 (270) days? (Y or N)

3. Comments: _____

B. Contingency and Emergency Planning.

1. Has the facility appointed an emergency coordinator?
(Y or N). (Name of Coordinator Wally Howard, Safety Mgr.)
10.1.3.d.1
2. Has the facility posted the following information next to the phone:
 - a. the name and telephone number of the emergency coordinator where he can be reached 24 hours a day?
(Y) or N) 10.1.3.d.2.A
 - * b. the location of fire extinguishers and spill control material and, if present, the fire alarm? (Y or (N))
10.1.3.d.2.B *Fire alarm is automatic*
 - c. the telephone number of the fire department, unless the facility has a direct alarm? (Y) or N)
10.1.3.d.2.C
3. Can the generator ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies? (Y) or N)
10.1.3.d.3
4. Comments: Automatic fire alarm & extinguishers
They have telephone network system and paging system

IV. Recordkeeping Requirements.

- A. Has the generator a copy of each manifest completed in the past three years? (Y) or N) 10.1.2
- B. Are his manifests completed properly? (Y) or N) 10.1
- C. If the generator's wastes are shipped off-site under a contractual agreement as outlined at 10.1.1 of the WV Hazardous Waste Regulations, does the generator have a copy of this agreement on file? (for at least three years after termination of the agreement) (Y or N) 10.1.1.b
- * D. Has the generator a copy of any test results or waste analyses performed in accordance with 6.1.1 of the WV Hazardous Waste Regulations (Hazardous Waste Determination) during the past three years? (Y or (N)) 10.1.2
- E. Comments: Waste det. by Belpan - no copy of analysis received.



STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
CHARLESTON 25306

ARCH A. MOORE, JR.
Governor

Division of Water Resources
1201 Greenbrier Street
Charleston, WV 25311
304/348-5935

RONALD R. POTESTA
Director

MICHAEL A. FOTOS
Deputy Director

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

July 14, 1986

Ms. Coleen Clohessy
Federal Correctional Institution
P. O. Box A
Alderson, West Virginia 24910

WV 4 15 190 9122

REC'D COMPLIANCE DIV
AUG 28 1986

Dear Ms. Clohessy:

On March 12, 1986, authorized representatives of the Chief of the Division of Water Resources conducted a Compliance Evaluation Inspection at your facility. During the inspection the following areas of non-compliance were noted:

1. The facility has not made a hazardous waste determination for all wastes generated at the facility in accordance with Section 6.1.1 of the West Virginia Administrative Regulations, Chapter 20, Article 5E, Series XV (hereinafter the Regulations).
2. The facility is disposing of waste solvent soaked rags in an on-site boiler. This is a violation of Section 11.1 of the Regulations.
3. The facility is storing a container of hazardous waste which has not been labeled as such. This is a violation of Section 6.3.5.a.5 of the Regulations.

This letter will serve as a **Notice of Non-Compliance** of the provisions of Chapter 20, Article 5E of the Code of West Virginia. In order to gain compliance, the Federal Correctional Institution at Alderson, West Virginia must comply with the following:

1. Within forty-five (45) days of receipt of this letter, perform a hazardous waste determination on all wastes generated at your facility. This should include, but not be limited to, the film developer, stop-bath and UV printing inks noted in the "Compliance Evaluation Inspection" report of May 16, 1986.
2. Within sixty (60) days of receipt of this letter submit to the Division of Water Resources the results of the determination required by Term #1. This should include, but not be limited to, any analytical test results and "Material Safety Data Sheets".
3. Upon receipt of this letter cease disposing of your solvent soaked rags in the on-site coal fires boiler.
4. Upon receipt of this letter all containers holding hazardous waste should be marked clearly with the words "Hazardous Waste".
5. Within fifteen (15) days of receipt of this letter, respond in writing to the Division of Water Resources documenting that Terms #3 and #4 have been complied with.

A copy of this letter will be forwarded to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

If you should have any questions concerning this matter please feel free to contact Mr. John Meeks of this office at 304/348-5929.

Sincerely,

DIVISION OF WATER RESOURCES



Mark N. Casdorph
Compliance Monitoring and
Enforcement Section Leader
Solid & Hazardous Waste/
Ground Water Branch

MNC/jmd

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
Penny Brown, Inspector

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection *Federal Correction Institution*
WV 4 15 190 9122
ALDENSON, West Virginia

FROM: *DAD* Douglas A. Donor, Environmental Scientist
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: *J* John A. Armstead, Chief
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

DATE: *6/10/86*

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

Needs Waste Analysis,



STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
CHARLESTON 25305

ARCH A. MOORE, JR.
Governor

Division of Water Resources
1201 Greenbrier Street
Charleston, WV 25311
304/348-5935

RONALD R. POTESTA
Director
MICHAEL A. FOTOS
Deputy Director

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

May 16, 1986

Ms. Coleen Clohessy
Federal Correctional Institution
P. O. Box A
Alderson, West Virginia 24910

ENVIRONMENTAL COMPLIANCE SECTION
RECEIVED
MAY 30 1986

Dear Ms. Clohessy:

Enclosed is your copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Water Resources. This report is based on the inspection conducted on March 12, 1986.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Branch with an additional copy transmitted to the United States Environmental Protection Agency (U.S.EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you should have any questions concerning the inspection or enclosed report, please feel free to contact this office.

Sincerely,

DIVISION OF WATER RESOURCES

Mark N. Casdorff
Acting Compliance Monitoring
and Enforcement Section Leader
Solid & Hazardous Waste/
Ground Water Branch

MNC/pd
Enclosure

cc: Doug Donor, EPA, Region III
Jim Duranti, Enforcement Unit
Penny Brown, Inspector

FACILITY FACT SHEET

I. D. No. WW4151909122 Facility Type D
Facility Class R
Facility Status SOG

Company Name Federal Correctional Institution

Address P. O. Box A

City, State Alderson, West Virginia Zip 24910 County 54063

Contact Coleen Clohessy Area Code 304 Phone 445-2901 (Ext. 368)

INSPECTION DATE	TYPE	VIOLATION	CLASS	AREA	STATUS
<u>3/12/86</u>	<u>01</u>	<u>Y</u>	<u>1</u>	<u>G</u>	<u>V</u>

Inspector(s) Penny Brown & Rebecca J. Robertson

TABLE OF CONTENTS

Location Map

Inspection Report

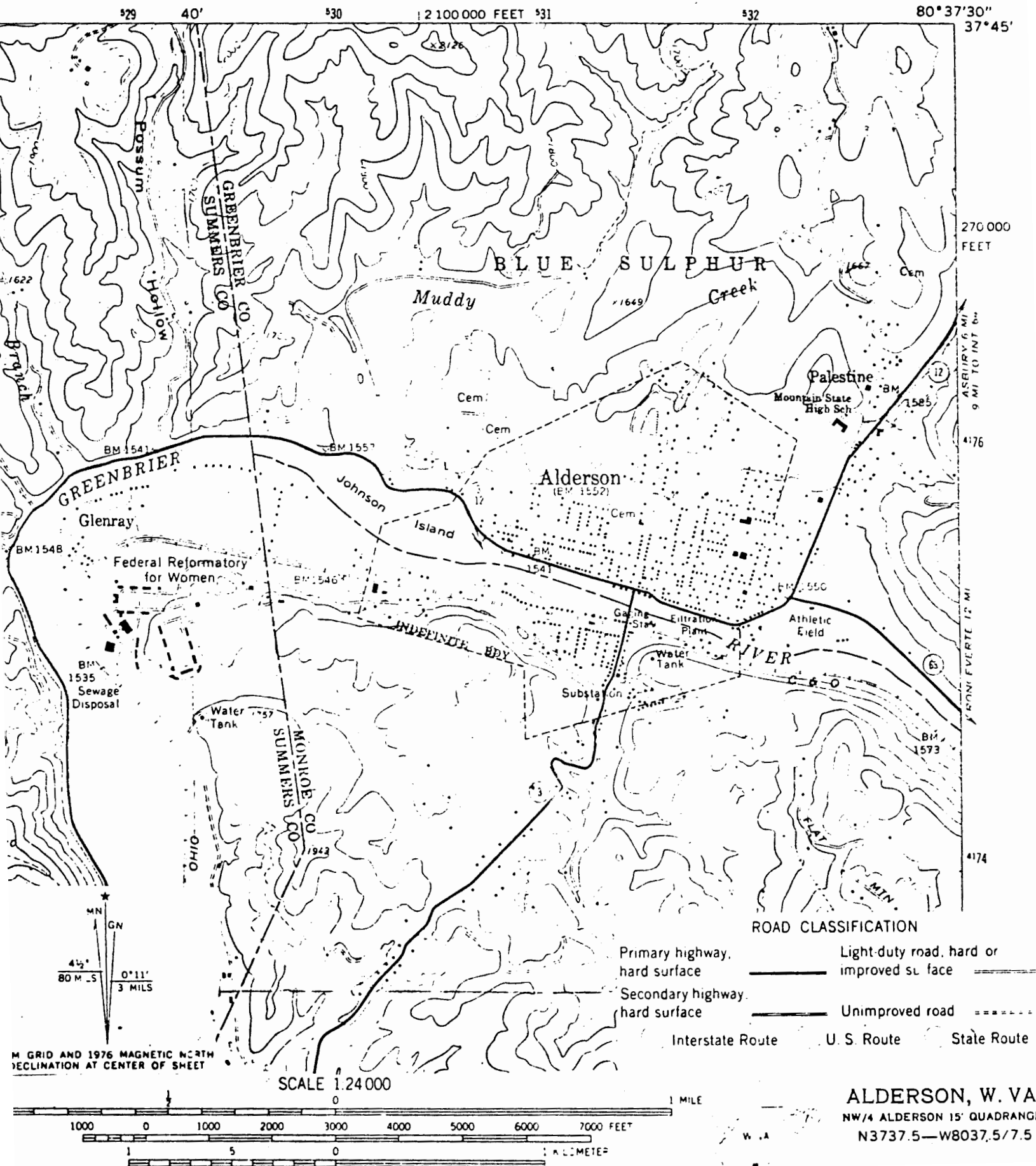
Compliance Evaluation

Attachments: A - Small Quantity Generator Checklist
 B - Container Checklist
 C - Photos
 D - Photo Log
 E - Site Map

URVEY

ALDERSON QUADRANGLE
WEST VIRGINIA
7.5 MINUTE SERIES (TOPOGRAPHIC)
NW/4 ALDERSON 15' QUADRANGLE

4859 1st
IASBUF



DATE PREPARED: March 14, 1986

PREPARED BY: Penny Brown, Water Resources Inspector-in-Training

SUBJECT: CEI at Federal Correctional Institution

DATE OF INSPECTION: March 12, 1986

On the above date, Inspector Rebecca J. Robertson and this inspector conducted a Compliance Evaluation Inspection (CEI) at the Federal Correctional Institution, Alderson, West Virginia. Coleen Clohessy, factory manager and John Dolan, foreman, accompanied us through the factory. Credentials were presented to Ms. Clohessy and the purpose of the inspection discussed. Ms. Clohessy was advised that the inspection was being conducted in accordance with the West Virginia Administrative Regulations for Chapter 20, Article 5E, and with the Resources Conservation and Recovery Act (RCRA) Section 3007(a) and consented to the inspection.

We toured the facility with Ms. Clohessy and Mr. Dolan and were shown the various processes involved in the U.N.I.C.O.R. printing factory operating at the Institution. This factory is engaged in the design and manufacture of decals for various federal agencies. Photographic equipment is used to size the decal; workers then do additional artwork, layout and finally silk-screen printing of the decals using ultra-violet inks. Very little liquid form hazardous waste is generated, primarily from the film developer and stop-bath, however, approximately 20 pounds per week of solvent/ink-coated rags are generated. The disposal of these rags is their primary concern at present.

The rags are soaked in T-902, a lacquer thinner composed of various solvents, and isopropyl alcohol. They are used to wipe excess ultra-violet printing ink from the print screens. Once the rags are dirtied with ink and can not be used again, they are disposed of in plastic bag lined fire-proof containers. When the containers are filled, the bags are tied and taken to the coal incinerator where they are emptied into the incinerator.

Mr. Dolan showed us the drum storage area, which is relatively new and in good condition. It is an insulated metal building, dyked and located behind a locked fence. Presently it houses only empty drums and drums of unused T-902 and isopropyl alcohol. Thus far, the facility has yet to fill a 55-gallon drum with liquid hazardous waste. We were shown the one partially filled drum which

is kept in the factory in a dyked room where screens are cleaned. Mr. Dolan was informed that the drum needed to be properly labeled with a hazardous waste label.

Checklists were completed during and after the tour. We discussed with Ms. Clohessy and Mr. Dolan the possibility that incinerating the rags could be a violation unless it could be shown that the rags do not contain hazardous waste or that the BTU value of the waste in the rags is great enough for incineration to be considered beneficial use/re-use.

We thanked Ms. Clohessy for her time. Mr. Dolan escorted us back to the Guard House and we departed.

Compliance Evaluation

The following items of non-compliance were noted during the inspection:

1. In violation of Section 6.1.1 of the West Virginia Administrative Regulations for Chapter 20, Article 5E of the West Virginia Code, the facility has not made a hazardous waste determination for all wastes generated on site, specifically for the film developer and stop-bath solutions and the ultra-violet printing inks.
2. In violation of Section 11.1 of the West Virginia Administrative Regulations for Chapter 20, Article 5E of the West Virginia Code, the facility is disposing of solvent/inks soaked rags in an on-site coal incinerator. This may be considered treatment of hazardous waste unless the BTU value of the solvents and inks in the rags can be shown to be great enough for incineration to be considered beneficial re-use.
3. In violation of Section 6.3.5.a.5 of the West Virginia Administrative Regulations for Chapter 20, Article 5E of the West Virginia Code, the drum containing liquid hazardous waste was not labeled "Hazardous Waste".

RCRA Checklist for Small Quantity Generators of Hazardous Waste

R.O. USE

Inspection file #

Name of Facility: Federal Correction Institution

Address: P.O. Box A

Alderson, WV 24910

Generator ID Number: WV4151909112

Name: Coleen Clohessy Factory Manager

Telephone Number: 304 445-2901 ext 368

Reviewer:

Date Reviewed:

Form "C"

Questions contained in this checklist apply to owners and operators who are small quantity generators (less than 1000 kg per month).

1. Has the facility identified all hazardous wastes generated on site in accordance with 8262.117 *need MSDS for ink, film bath & stop.*

~~Yes~~ **No**

2. What types of waste are generated at the facility and the quantity of each per month?

FOOS
4220 130-40 lb/mo. 1 1

3. Does the facility treat or dispose of his hazardous waste in an on-site facility; or ~~incinerating waste~~ *at on-site incinerator* ensure delivery to an off-site treatment, storage or disposal facility? *Have disposed of none at this time*

Yes

4. Does either the on-site (treatment, disposal) or off-site (treatment, storage or disposal) facility?

A. Have a Federal hazardous waste permit?

Yes

B. Have interim status?

Yes

C. Beneficially use or reuse, or legitimately recycle or reclaim hazardous waste?

? Yes

D. Treat waste prior to beneficial use or reuse, or legitimate recycling or reclamations?

E. Have a State permit to manage industrial or municipal hazardous waste?

Yes

5. Please list name, address and EPA I.D. number for each facility where each waste is disposed.

N/A

6. Has the small quantity generator accumulated an amount of hazardous waste on-site, which is greater than?

A. 1000 Kilograms?

Yes ☒ No ☐

B. 1 Kilogram of acutely hazardous waste?

Yes ☐ No ☒

C. 100 Kilograms of any residue, contaminated soil, water or debris from a spill of hazardous waste?

Yes ☐ No ☒

7. If so,

A. Is the date upon which the accumulated amount in question 6 was reached clearly marked on the container?

N/A Yes ☒ No ☐

B. Has the hazardous waste been stored at the facility for greater than 90 days from the accumulation date in (A) above?

N/A Yes ☐ No ☒

C. Are the containers packaged, labeled and marked in accordance with DOT regulations?

N/A Yes ☐ No ☐

D. Is the hazardous waste stored in an on-site facility, which has interim status or a State/Federal hazardous waste permit?

N/A Yes ☐ No ☐

Inspector's Name:

Penny Brown

Title:

Water Resources Inspector In Training

Agency:

Dept of Natural Resources, Water Resources Div., Solid/Haz Waste Branch

Office Location:

350 N. Vance Dr. Beckley, WV 25801

Date of Inspection:

March 12, 1986

Inspector's Name:

Becky Robertson

Title:

Water Resources Inspector

Agency:

WV DNR Water Resources Div.

Office Location:

1260 Greenbrier St. Charleston, WV

Date of Inspection:

March 12, 1986

RCRA Checklist for Use and Management of Containers
(Subpart 1 Section 265.170 - "General Operating Requirements")

P.O. USE

Inspection file:

Facility:

Federal Correction Institution

Address:

P.O. Box A

Reviewer:

Atkinson IV 24910

Date Reviewed:

Generator ID Number:

WV 4151909112

Facility Inspection Representative:

Colin S. Sweeney

Signature:

Facility Manager

Form "I"

Telephone Number:

304 445-2901

Questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

C. Regs.
C.F.R.
C:

171

1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

Yes

171

2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?

Yes

173(a)

3. Are all containers holding hazardous waste kept closed during storage?

Yes

174

4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?

Yes

15(d)

15(b)

5. Is an inspection log maintained? *There is only 1 drum at present. It is in good condition in storage.*

Yes

176

6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

Yes N/A

177(a)

7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)

Yes

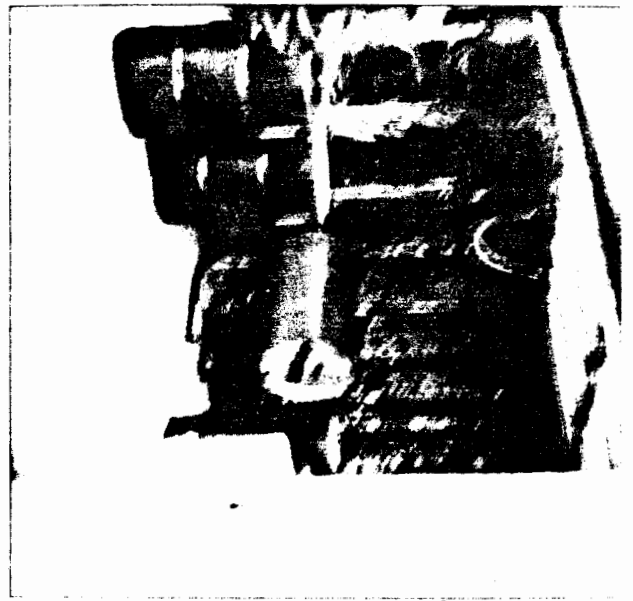
177(c)

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

Yes N/A

's Name: Penny Brown
Water Resource Inspector in Training
: DNR Water Resource Div.
location: Berkeley
of Inspection: March 12, 1986

ctor's Name: Berkeley Association
: Water Resource Inspector
y: DNR Water Resources Div.
e location: Charleston
of Inspection: March 12, 1986



Company name Federal Correctional Institution Location Alderson
Facility name _____ Stream Greenbrier River

[illegible]

Photographer's signature

Rebecca J. Robertson

1. Photo number
- *2. Film description (type, ASA, expiration date)
- *3. Focal length of lens used
- *4. F-Stop, Shutter speed
5. Lighting conditions

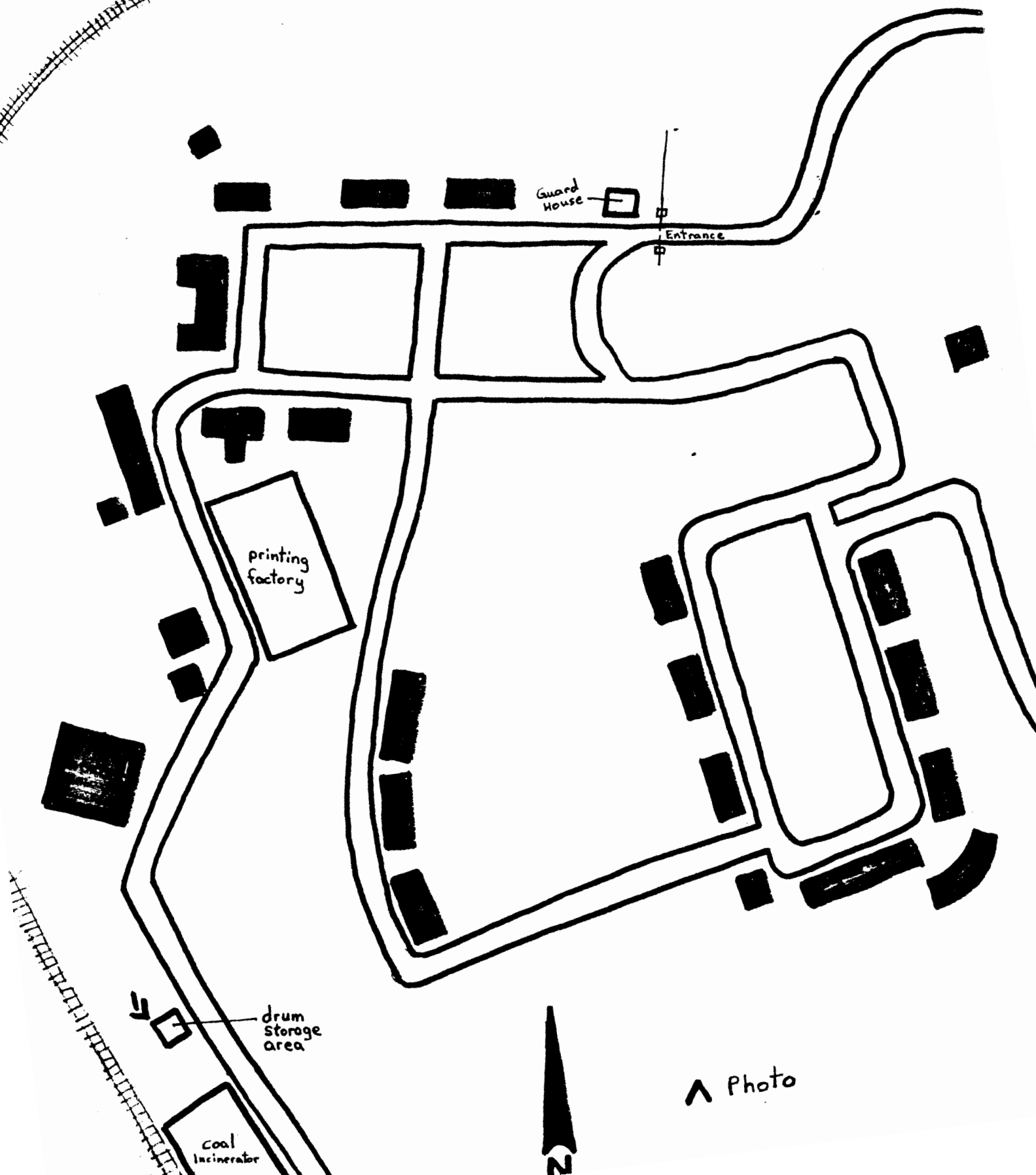
6. Weather
7. Date/Time
8. Location
9. Brief description of photo

*Not necessary for instant development film

FILM TURNED OVER TO _____ FOR DEVELOPING ON _____
PHOTOGRAPHS WERE RECEIVED ON _____ FROM DEVELOPER _____

SITE-MAP

Federal Correctional Institution - Alderson, WV



Hazardous Waste Quantity Notification


Business Name FEDERAL CORRECTIONAL INSTITUTION
Business Address P.O. BOX A
ALDERSON, WEST VIRGINIA 24910
EPA ID Number WV4151909112

Hazardous Waste Generated

0 - 100 kg/month XXXXXXX

100 - 1000 kg/month

1000 kg/month or more


W.B. Howard, Safety Manager

Signature and Title



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

United States
Environmental Protection
Agency

Washington DC 20460

John A. Armstead
John A.

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5100-11 (5-79)

Hazardous Waste Quantity Notification

Business Name Federal Correctional Institution

Business Address Box A

Alderson WV 24910

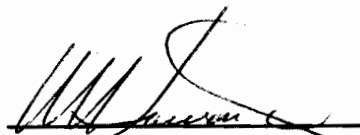
EPA ID Number WV4151909112

Hazardous Waste Generated

0 - 100 kg/month XXXXX

100 - 1000 kg/month

1000 kg/month or more

 Safety Manager

Signature and Title



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

HL

United States
Environmental Protection
Agency

Washington DC 20460

SAFETY OFFICE

•
JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

10

I.D. - FOR OFFICIAL USE ONLY																
S															T/A	C
W																1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F003 23 - 26	2 F005 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

N/A	13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
	19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
	25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U013 23 - 26	32 U159 23 - 26	33 U165 23 - 26	34 U220 23 - 26	35 U239 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

N/A	49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
-----	---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)


☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Wallace B. Howard, Safety Manager	DATE SIGNED 1-11-85
--	--	------------------------